

# EXHIBIT 2

CHRISTOPHER WARD, CA Bar No. 238777  
cward@foley.com

**FOLEY & LARDNER LLP**  
555 SOUTH FLOWER STREET, SUITE 3500  
LOS ANGELES, CA 90071-2411  
TELEPHONE: 213.972.4500  
FACSIMILE: 213.486.0065

JASON WU, CA Bar No. 313368  
jwu@foley.com

**FOLEY & LARDNER LLP**  
555 CALIFORNIA STREET, SUITE 1700  
SAN FRANCISCO, CA 94104-1520  
TELEPHONE: 415.434.4484  
FACSIMILE: 415.434.4507

Attorneys for Defendant MENZIES  
AVIATION, INC.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

Renaldo Navarro,

Plaintiff,

vs.

Menzies Aviation, Inc., DOING BUSINESS AS  
MENZIES; and DOES 1 through 10, inclusive,

Defendants.

) Case No. 3:19-cv-8157

) **DECLARATION OF CHRISTOPHER**  
) **WARD**

) State Court Action Filed: 10/23/19

) Action Removed: December 16, 2019

**DECLARATION OF CHRISTOPHER WARD**

I, Christopher Ward, declare as follows:

1. I am an attorney admitted to practice before all state and federal courts in the State of California, including the United States District Court for the Northern District of California, and a partner at Foley & Lardner LLP, counsel of record for Defendant Menzies Aviation, Inc. I have personal knowledge of the facts contained in this declaration, and if called upon as a witness, I could and would competently testify thereto.

2. On July 23, 2020, I took the deposition of Plaintiff Renaldo Navarro. Following that deposition, I received a certified copy of the transcript of that deposition, and I have read, reviewed and maintained a copy of that transcript in connection with this matter. A true and correct copy of excerpts from the transcript of Plaintiff's deposition is attached hereto as **Exhibit 12**.

3. On July 27, 2020, Plaintiff's counsel deposed Menzies' Duty Manager John Qualley for a first time, and on July 28, 2020, Plaintiff's counsel completed the deposition of Mr. Qualley. Following those depositions, I received a certified copy of the transcripts of both deposition, and I have read, reviewed and maintained a copy of those transcripts in connection with this matter. A true and correct copy of excerpts from Volume I of the transcript of Mr. Qualley's deposition is attached hereto as **Exhibit 13**, and a true and correct copy of excerpts from Volume II of the transcript of Mr. Qualley's deposition is attached hereto as **Exhibit 14**.

4. On August 25, 2020, Plaintiff's counsel deposed Menzies' Human Resources Manager Tracy Aguilera. Following that deposition, I received a certified copy of the transcript of the deposition, and I have read, reviewed and maintained a copy of that transcript in connection with this matter. A true and correct copy of excerpts from Ms. Aguilera's deposition is attached hereto as **Exhibit 15**.

5. On August 25, 2020, Plaintiff's counsel deposed Menzies' former SFO Director of Operations Raul Vargas. Following that deposition, I received a certified copy of the transcript of the deposition, and I have read, reviewed and maintained a copy of that transcript in connection with this matter. A true and correct copy of excerpts from Mr. Vargas's deposition is attached hereto as **Exhibit 16**.

6. On July 28, 2020, Plaintiff's counsel deposed Menzies' Fueling Supervisor Andrew

1 Dodge. Following that deposition, I received a certified copy of the transcript of the deposition, and I  
2 have read, reviewed and maintained a copy of that transcript in connection with this matter. A true and  
3 correct copy of excerpts from Mr. Dodge's deposition is attached hereto as **Exhibit 17**.

4 7. On March 17, 2020, Plaintiff's counsel served on me Plaintiff's Fed. R. Civ. P. 26(a)(1)  
5 Initial Disclosures, which included a production of 14 total documents. One of those documents, Bates  
6 marked "Renaldo Navarro 000009" appears to be a picture of a letter authored by a Rafael Vasquez. I  
7 had never seen this document prior to receiving Plaintiff's Initial Disclosures production because it was  
8 not part of any of the files Menzies Aviation provided me in response to my file requests regarding  
9 Plaintiff. A true and correct copy of "Renaldo Navarro 000009" produced to me by Plaintiff's counsel is  
10 attached hereto as **Exhibit 28**.

11 I declare under penalty of perjury under the laws of the States of California and Illinois, and the  
12 laws of the United States, that the foregoing is true and correct.

13 Executed on October 15, 2020 at Elmhurst, Illinois.

14  
15  
16 /s/ Christopher Ward  
Christopher Ward  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28